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FIRIS COMMUNICATIONS CENTER
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FEBRUARY 8, 1993

FEDERAL COMMUNICATIONS COMMISSION
RE: SPECTRUM REFARMING

~~92-235~~ 92-235

DEAR SIRs:

IF I CAN BELIEVE WHAT I'VE READ CONCERNING YOUR SPECTRUM
REFARMING PROPOSAL; IT APPEARS AS THOUGH YOU HAVE COMPLETELY LOST
TOUCH WITH THE REAL WORLD. EITHER THAT OR THE COMMISSION HAS BEEN
BOUGHT BY THE RADIO MANUFACTURER'S LOBBY.

WHILE THE IDEA OF TRUNKING IS TECHNICALLY SOUND, THE PROPOSED
TARGET AREAS AND TIMETABLE ARE SHEER LUNACY. WORST OF ALL IT APPEARS
AS THOUGH THE IDEA OF PROVIDING ANY REAL CURES TO PRIVATE RADIO HAVE
BEEN FORGOTTEN ABOUT.

THE BEST WAY THAT THE PROBLEM OF INSUFFICIENT SPECTRUM CAN BE
SOLVED IS TO ADDITIONALLY ALLOCATE CURRENTLY UNUSED BROADCAST AND
LAND MOBILE SPECTRUM. WHILE I'M NOT INTIMATELY FAMILIAR WITH LA AND
NYC MOST OTHER LARGE CITIES HAVE VAST AMOUNTS OF SPECTRUM THAT IS
UNUSED (WASTED). WHILE BROADCAST APPEARS AS THE BIGGEST WASTE, FEDERAL
GOVERNMENT FREQUENCIES IN LAND MOBILE ARE JUST AS BAD. A SHORT LOOK
WITH A SPECTRUM ANALYSER WILL SHOW YOU JUST HOW BAD THINGS ARE RIGHT
NOW.

I AM FROM THE CLEVELAND, OHIO AREA AND I CAN TELL YOU THAT A 10
OR 20 CHANNEL TRUNKING SYSTEM COULD EASILY HANDLE ALL FEDERAL COMM.
NEEDS INCLUDING MILITARY. WHY THEN DOES THE FED GOVERNMENT NEED OVER
40 MHZ?

THE SAME SITUATION EXISTS WITH THE TV BROADCAST BAND. WHILE THEY
USE UP TO 40% OF THEIR AVAILABLE SPECTRUM THEY STILL WASTE A HELL OF
A LOT TOO. MAYBE THE COMMISSION HAS BEEN BOUGHT OUT BY THE TV
BROADCAST LOBBY ALSO. IT'S THE ONLY THING THAT MAKES SENSE.

THE AIRCRAFT BAND HAS BEEN UNTOUCHED FOR YEARS EXCEPT TO SPACE
CHANNELS DOWN TO 25 KHZ. WHILE A.M. CAN EASILY BE SPACED TWICE AS
CLOSE AS N.B.F.M. THEY MAINTAIN SPACINGS 2-4 TIMES THAT CURRENTLY IN
USE AND PROPOSED FOR LAND MOBILE. THIS DOES NOT MAKE SENSE. THEN
AGAIN, I GUESS THE AIRLINES AND PRIVATE PILOTS HAVE A PRETTY GOOD
LOBBY, HUH?

PROPOSING TO CHANGE ALL OF LAND MOBILE BELOW 512 MHZ. WILL
CERTAINLY SELL A LOT OF RADIOS (A FORCED SALE). THIS I'M SURE WILL MAKE
THE MANUFACTURERS LOBBY ETERNALLY GRATEFUL. WHERE ON EARTH DID YOU
COME UP WITH 1996 FOR A FINAL CHANGEOVER DATE? MOST SYSTEMS NOW IN
SERVICE HAVE A LIFE EXPECTANCY OF 10-30 YEARS. SOME SYSTEMS CURRENTLY
BEING SOLD, AND JUST SOLD WILL STILL BE IN WARRANTY AT THAT TIME. ARE
YOU REALLY PROPOSING TO TELL THESE OPERATORS THAT THEIR CAPITOL
OUTLAYS WILL BE WORTHLESS IN 3 YEARS? IF SO YOU PEOPLE ARE NUTS!

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List A B C D E

I HAVE BEEN INVOLVED IN RADIO COMMUNICATIONS FOR 22 YEARS AND THIS IS BY FAR THE DUMBEST N.P.R.M. THAT I'VE EVER SEEN COME OUT OF WASHINGTON. IT IS THINGS LIKE THIS THAT CAUSE PEOPLE TO FORGET BOTHERING TO GET LICENSES AND OPERATE ILLEGALLY.

I WILL BE FORWARDING COPIES OF THIS LETTER TO MY CONGRESSMEN AND VARIOUS LOCAL NEWSPAPERS AND TRADE JOURNALS.

THANK YOU FOR YOUR CONSIDERATION, _

David W. Firis

DAVID W. FIRIS

OWNER

FIRIS COMMUNICATIONS CENTER

F.C.C.LICENSES: WB8KVT-AMATUER ADVANCED
PG-19-10300 GENERAL RADIOTELEPHONE OP.
KNHN 456 BUSINESS BAND
WNBK 574 " "